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DON A. MATTRICK, NANCY L. SMITH,  
STEPHEN BENÉ, J. RUSSELL RUEFF, JR. and  
ELECTRONIC ARTS, INC.,

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

14 WALTER HAMMOCK, derivatively on  
15 behalf of Nominal Defendant ELECTRONIC  
ARTS, INC..

Case No. C-05-02009-MMC

**STIPULATION AND [PROPOSED]  
ORDER STAYING CASE UNTIL  
RESOLUTION OF MOTION TO  
DISMISS RELATED CLASS ACTION**

Judge: Hon. Maxine M. Chesney

Date Comp. Filed: May 16, 2005

18 M. RICHARD ASHER, BRUCE  
19 McMILLAN, LEONARD S. COLEMAN,  
20 TIMOTHY MOTT, WILLIAM J. BYRON,  
21 ROBERT W. PITTMAN, JOEL LINZNER,  
22 WARREN C. JENSON, GERHARD  
FLORIN, LAWRENCE F. PROBST, III,  
DON A. MATTRICK, NANCY L. SMITH,  
STEPHEN BENÉ and J. RUSSELL RUEFF,  
JR.

## Defendants,

24 | and

25 ELECTRONIC ARTS, INC.,

## Nominal Defendant,

1           **WHEREAS**, this action was filed on May 16, 2005; and

2           **WHEREAS**, on June 20, 2005 this action was related to case 05-1219 MMC, *In re*  
3 *Electronic Arts Securities Litigation*; and

4           **WHEREAS**, an amended complaint was filed in *In re Electronic Arts Securities*  
5 *Litigation* (the “Related Class Action”) on August 12, 2005; and

6           **WHEREAS**, by prior order of this Court, defendants have until September 26, 2005 to  
7 respond to the amended consolidated complaint; and

8           **WHEREAS**, defendants intend to file a motion to dismiss the Related Class Action  
9 complaint; and

10          **WHEREAS**, the issues raised by the Related Class Action complaint and the issues  
11 raised in the instant action are interrelated as they involve the same facts and some of the same  
12 legal theories; and

13          **WHEREAS**, the parties have met and conferred extensively about this case and agree  
14 that it would be more efficient if the Court considered any motion related to this case after the  
15 Court resolves defendants’ motion to dismiss the Related Class Action; and

16          **WHEREAS**, the parties believe that it would conserve judicial resources if the court was  
17 not required to consider a motion to dismiss the instant complaint until after it had ruled on the  
18 Related Class Action complaint; and

19          **WHEREAS**, the parties further believe that the Court’s ruling on defendants’ motion to  
20 dismiss the Related Class Action complaint will have a significant impact on the potential  
21 disposition of this case, including but not limited to settlement or dismissal,

22          **IT IS THEREFORE STIPULATED THAT:**

- 23          1. Plaintiffs shall not be required to file an amended complaint in this action until  
24                 30 days after the court rules on Defendants’ forthcoming motion to dismiss the  
25                 Related Class Action complaint in *In re Electronic Arts Securities Litigation*;  
26          2. All other proceedings in this case, including all discovery and initial disclosure  
27                 requirements, are stayed until 30 days after the court rules on Defendants’  
28                 forthcoming motion to dismiss the Related Class Action complaint in *In re*

## *Electronic Arts Securities Litigation.*

3. Defendants shall have 45 days from the date an amended complaint is filed to answer or otherwise respond to the amended complaint. Should defendants move to dismiss the amended complaint, Plaintiffs shall have 45 days from the date of the filing of Defendants' motion to dismiss to file their opposition, and Defendants shall have 15 days to file their reply.

Dated: September 6, 2005.

KEKER & VAN NEST, LLP

By: /s/ Michael D. Celio  
MICHAEL D. CELIO  
Attorneys for Defendants  
M. RICHARD ASHER, et al.

Dated: September 6, 2005.

## MARY ALEXANDER ASSOCIATES

By: /s/ Mary E. Alexander (by express permission)  
MARY E. ALEXANDER  
Attorneys for Plaintiff  
WALTER HAMMOCK

## **IT IS SO ORDERED.**

Dated: September 6, 2005

By: Maxine M. Chesney  
HON. MAXINE M. CHESNEY  
UNITED STATES DISTRICT COURT